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9
10 **UNITED STATES DISTRICT COURT**
11
12 **FOR**
13
14 **THE NORTHERN MARIANA ISLANDS**
15

16 UNITED STATES OF AMERICA,) CRIMINAL CASE NO. 08-00014
17 Plaintiff,)
18 vs.) DEFENDANT LAWRENCE KALEN'S
19) MOTION FOR MODIFICATION OF BAIL
20) CONDITIONS
21)
22)
23)
24) Defendants.) Time: 9:30 a.m.
25)) Date: July 22, 2008
26)) Judge: Munson
27)
28)

18 Lawrence Kalen, defendant in the above-entitled action, by and through his counsel , Bruce
19 Berline, hereby moves the court, pursuant 18 U.S.C. § 3142 (c)(3), to modify Defendant's conditions
20 of bail.

21 This motion is made on grounds that Defendant Kalen has an employment opportunity as a
22 security guard; however, his curfew must be modified in order for him to work. Accordingly, Defendant
23 Kalen requests that his curfew, presently set between the hours of 6 p.m. to 6 a.m., be reduced to include
24 only the hours between 3 a.m. and 6 a.m.

25 Dated this 18th day of July, 2008.

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27 
28 **BRUCE BERLINE**
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